From: Gretchen Schaefer <gschaefer@nafoalliance.org>

Sent: Thursday, November 20, 2014 3:21 PM

To: McCabe, Janet

Subject: EPA "gets it" on biomass if they focus on the carbon



A <u>blog</u> from Dave Tenny, NAFO President and CEO, November 20, 2014

EPA "gets it" on biomass if they focus on the carbon

Yesterday the Environmental Protection Agency (EPA) delivered the message that biomass is part of the climate and renewable energy solution. EPA stated in a memorandum to regional offices that biomass is a renewable energy pathway for states to reach carbon reduction targets under the proposed Power Plan Rule and that the agency will propose that biomass can be carbon neutral in forthcoming amendments to the Tailoring Rule. This action brings EPA into alignment with the White House and the U.S. Department of Agriculture (USDA). All three now acknowledge the significant carbon benefits of forests, wood and biomass. They all "get it" - biomass is good for the climate.

But "getting it" only works if EPA remains focused on the carbon...read more

This message was sent from Gretchen Schaefer to mccabe.janet@epa.gov. It was sent from: National Alliance of Forest Owners, 122 C
Street NW Suite 630, Washington, DC 20001.
Our Website www.nafoalliance.org
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From: Goffman, Joseph

Sent: Tuesday, November 11, 2014 6:54 PM

To: Dunham, Sarah; Gunning, Paul; Irving, Bill; McCabe, Janet; Tsirigotis, Peter **Subject:** Fwd: Letter from Forestry Deans to Gina on Biomass Carbon Accounting

Attachments: DOC.PDF; ATT00001.htm

Joseph Goffman
 Sent from my iPhone

Begin forwarded message:

From: Dave Tenny < dtenny@nafoalliance.org Date: November 11, 2014 at 5:40:32 PM CST

To: "'Goffman, Joseph (Goffman.Joseph@epa.gov)'" < Goffman.Joseph@epa.gov > Subject: Letter from Forestry Deans to Gina on Biomass Carbon Accounting

Hi, Joe – I assume you already saw this, but just in case I thought I would send it along. I received it from the Deans late last week.

Dave

David P. Tenny
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NAUFRP Executive Liaison Terri Bates naufrp@verizon.net November 6, 2014

Gina McCarthy, EPA Administrator U.S. Environmental Protection Agency William Jefferson Clinton Federal Building 1200 Pennsylvania Avenue, N.W. Mail Code: 1101A Washington, DC 20460

Dear Administrator McCarthy:

On behalf of the National Association of University Forest Resources Programs representing 80 of the country's universities that have programs devoted to forest resources and who share a common purpose to advance the health, productivity and sustainability of our nation's forests, we are pleased to write you regarding your ongoing efforts on biomass carbon accounting.

As leaders in the science community, we appreciate your consistent emphasis on providing a strong science foundation for agency policy. We also acknowledge and wish to respond to your several requests for current, peer-reviewed science to inform the agency's work.

To that end, we provide the attached summary of science fundamentals, signed by more than 100 university experts in the field, that many in the science community, and the forestry disciplines in particular, strongly believe should underlie the agency's policy considerations for biomass carbon accounting. These fundamentals, which are essential to understanding and benefitting from the low carbon attributes of managed forests and the biomass derived from them, are also addressed in an article appearing in the November issue of the Journal of Forestry.

We appreciate the difficult task the agency faces as it tries to develop reasonable policies consistent with sound, relevant science. We recognize, for example, that in the carbon accounting context the agency must rely on the expertise and judgment of policy makers to establish appropriate baselines, monitoring protocols and other implementation and compliance approaches that apply science in a relatively simple and cost effective way. We believe the fundamentals we provide can support a variety of policy approaches that meet programmatic requirements while addressing the practical needs of both the regulating and regulated community.

Gina McCarthy, EPA Administrator November 6, 2014 Page 2

We invite the EPA to carefully consider these science fundamentals and look forward to lending our expertise to the agency as it further develops a sound, science-based accounting policy for biomass energy.

Respectfully,

Steve H. Bullard, President Stephen F. Austin State University James A. Allen, President-Elect Northern Arizona University

James a. allen

Tim White

Tim White, Immediate Past President University of Florida

Janaki Alavalapati, Policy Chair Virginia Tech

Science Fundamentals of Forest Biomass Carbon Accounting

Policy makers are increasingly considering the use of forest biomass energy to meet national, regional and state energy and carbon emissions objectives. As they do so, it is imperative that their policy decisions be informed by current peer-reviewed science on the carbon impacts of woody biomass as an energy source. Some studies on the subject offer views with stringent assumptions that may be confusing to decision-makers.

Peer-reviewed literature examining the net emissions from the wide spectrum of forest-based activities reveals a number of important fundamentals policy makers should consider when characterizing the carbon impacts of the increased use of forest biomass for energy. While these fundamentals do not address all of the issues policy makers confront, they help clarify those most directly affecting the potential role forest biomass energy can play in energy and climate policy.

As experts in forest science, we recommend the following four science fundamentals to policy makers and others seeking to develop a science-based approach to biomass energy production.

Fundamental 1: The carbon benefits of sustainable forest biomass energy are well established.

The long-term benefits of forest biomass energy are well-established in science literature. As stated in the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, "In the long term, a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit.²" Most debates regarding the carbon benefits of forest biomass energy are about the timing of the benefits rather than whether they exist.

Fundamental 2: Measuring the carbon benefits of forest biomass energy must consider cumulative carbon emissions over the long term.

The most effective carbon mitigation measures are those which reduce carbon accumulation in the atmosphere over time. Forest biomass energy yields significant net decreases in overall carbon accumulation in the atmosphere over time compared to fossil fuels. Comparisons between forest biomass emissions

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Miner, R.A., R.C. Abt, J.L. Bowyer, M.A. Buford, R.W. Malmsheimer, J. O'Laughlin, E.E. Oneil, R.A. Sedjo, and K.E. Skog. 2014. Forest Carbon Accounting Considerations in U.S. Bioenergy Policy. *Journal of Forestry* Forthcoming http://www.ingentaconnect.com/content/saf/jof/pre-prints/content-jof14009

p. 543 Nabuurs, G.J., O. Masera, K. Andrasko, P. Benitez-Ponce, R. Boer, M. Dutschke, E. Elsiddig, et al. 2007. Forestry. Chapter 9 in *Climate change 2007: Mitigation*. Contribution of Working Group III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, Metz, B., O.R. Davidson, P.R. Bosch, R. Dave, and L.A. Meyer (eds.). Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. P. 541-584.

and fossil fuel emissions at the time of combustion and for short periods thereafter do not account for long term carbon accumulation in the atmosphere and can significantly distort or ignore comparative carbon impacts over time.

Fundamental 3: An accurate comparison of forest biomass energy carbon impacts with those of other energy sources requires the use of consistent timeframes in the comparison.

The most common timeframe for measuring the impacts of greenhouse gases is 100 years, as illustrated by the widespread use of 100-year global warming potentials.³ This timeframe provides a more accurate accounting of cumulative emissions than shorter intervals. Measuring the net cumulative carbon emissions from forest biomass energy over a 100 year timeframe, as is done for fossil fuels, more accurately captures and more appropriately demonstrates the cumulative carbon benefits of biomass energy compared to fossil fuels.

Fundamental 4. Economic factors influence the carbon impacts of forest biomass energy.

Research demonstrates that demand for wood helps keep land in forest and incentivizes investments in new and more productive forests, all of which have significant carbon benefits. This is particularly true when landowner investments are made in anticipation of future market demand. Likewise wood markets significantly influence both the availability of wood and the kind of wood used for biomass energy. For example, large trees better suited for higher value markets are typically not used for energy. The consideration of landowner response to the marketplace is essential to fully accounting for the long-term carbon impacts of using forest biomass for energy. Failing to consider the effects of markets and investment on carbon impacts can distort the characterization of carbon impacts from forest biomass energy.

Research on the use of forest biomass as an energy source to mitigate GHG emissions dates back to the late 1980's. Changes in technology, forest conditions, and markets and global economics will influence forest biomass utilization now and in the future. A commitment to continuing research on forest biomass utilization is necessary to quantify the risks and benefits associated with its use, encourage dialogue and debate, drive innovation and investment in new technologies and inform policy.

Forster, P., V. Ramaswamy, P. Artaxo, T. Berntsen, R. Betts, D.W. Fahey, J. Haywood, et al. 2007. Changes in atmospheric constituents and in radiative forcing. Chapter 2 in *Climate Change 2007: The physical science basis*. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor, and H.L. Miller (eds.). Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

Alavalapati, J.R.R., P. Lal, A. Susaeta, R. Abt, and D. Wear. 2013. Forest biomass-based energy pp213-260. A chapter In Southern Forest Future Project edited by D. Wear and J. Griess, U.S. Forest Service General Technical Report SRS-178, 1318 pages.

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Dehai Zhao, Ph.D. Research Scientist - Graduate Faculty Warnell School of Forestry & Natural Resources University of Georgia Athens, GA From:

Goffman, Joseph

Sent: To: Tuesday, September 16, 2014 6:13 PM Adm13McCarthy, Gina; McCabe, Janet

Cc:

Dunham, Sarah

Subject:

Fwd: Request for Accounting Framework Issuance for Public Comment

Attachments:

image002.jpg; ATT00001.htm; image003.jpg; ATT00002.htm; image004.jpg; ATT00003.htm; image005.jpg; ATT00004.htm; image006.jpg; ATT00005.htm; EPA Request for Framework

Issuance 091614 FINAL.pdf; ATT00006.htm

Joseph Goffman
 Sent from my iPhone

Begin forwarded message:

From: "Harman, Donna" < Donna Harman@afandpa.org>

Date: September 16, 2014 at 5:40:06 PM EDT

To: "'McCarthy.gina@Epa.gov'" < McCarthy.gina@Epa.gov>

Cc: "'goffman.joseph@epa.gov'" <goffman.joseph@epa.gov>, "'porterfield.terri@epa.gov'"

<porterfield.terri@epa.gov>

Subject: Request for Accounting Framework Issuance for Public Comment

Dear Gina,

Please find attached our request for issuance of the Accounting Framework for Biogenic CO2 Emissions for public comment as soon as possible. We appreciate the additional time you provided today for commenting on the 111(d) Proposed Rule, but hope that we can do it in conjunction with our review of the Accounting Framework.

Thank you for your consideration.

Best regards,

Donna

DONNA HARMAN

President and CEO

Donna Harman@afandpa.org

(202) 463-5151

AMERICAN FOREST & PAPER ASSOCIATION

1101 K Street, N.W., Suite 700

Washington, D.C. 20005







September 16, 2014

The Honorable Gina McCarthy, Administrator United States Environmental Protection Agency William Jefferson Clinton Building 1200 Pennsylvania Avenue, N.W.

Mail code: 28221T

Washington, D.C. 20460

Attn: Docket ID No. EPA-HQ-OAR-2013-0602

Re: Request for Notice of Data Availability and Extended Comment

Period

(Docket ID No. EPA-HQ-OAR-2013-0602)

Dear Administrator McCarthy:

On behalf of the forest products industry, we are writing to request that the United States Environmental Protection Agency (EPA) make available for public comment the revised *Accounting Framework for Biogenic CO₂ Emissions from Stationary Sources* (Accounting Framework) referred to in the proposed rule "Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units." 79 Fed. Reg. 34,830 (Jun. 18, 2014) (111(d) Proposed Rule). We appreciate that EPA extended the public comment period for the 111(d) Proposed Rule, but until the Accounting Framework is issued for public comment, we and other interested parties will not have an adequate opportunity to comment on the 111(d) Proposed Rule.

Three years ago, EPA committed to completing an Accounting Framework for biogenic CO₂ emissions by July 2014. While EPA proposed a draft Accounting Framework in September 2011, it has not yet issued a revised Framework for comment that accounts for the substantial and significant input of the public and the Science Advisory Board. The 111(d) Proposed Rule discusses the use of biomass energy as one option the states can use to mitigate greenhouse gas emissions. However, EPA has not disclosed how it intends to treat biogenic carbon emissions from affected entities and refers to the pending revised Accounting Framework. Interested parties who want to comment on biomass-related issues in the 111(d) Proposed Rule are deprived of their right to fair notice and an opportunity to comment so long as EPA fails to issue the revised Accounting Framework that will determine the central issue of biomass carbon neutrality.

The Honorable Gina McCarthy, Administrator United States Environmental Protection Agency September 16, 2014 Page 2

We request that the EPA immediately issue a Notice of Data Availability (NODA) that contains the Accounting Framework and provide a reasonable comment period to analyze it and develop comments on both the Framework and its effect on the 111(d) Proposed Rule.

EPA's recent actions support our request. On February 25, 2014, EPA issued a NODA in support of its proposed rule "Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources: Electric Utility Generating Units." 79 Fed. Reg. 10,750 (Feb. 26, 2014) (111(b) Proposed Rule). The 111(b) Proposed Rule NODA produced technical support documentation, which had not been produced to the docket at the time of proposal on January 8, 2014. In addition to rectifying its error via the NODA, EPA announced a 60-day extension of the public comment deadline for the 111(b) Proposed Rule. Thus, EPA has ample precedent to take the requested action under these circumstances.

In light of the concerns expressed by potentially affected entities, we strongly urge EPA to take immediate action to rectify this matter and release the Accounting Framework critical to meaningful public comment on biomass-related issues.

Sincerely,

Donna Harman President & CEO

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Robert Glowinksi President & CEO

American Wood Council

David P. Tenny President & CEO

National Alliance of Forest Owners

From: Goffman, Joseph

Sent: Thursday, August 07, 2014 1:35 PM

To: McCabe, Janet; Dunham, Sarah; Page, Steve; Tsirigotis, Peter; Gunning, Paul

Subject: Fw: Letter to Podesta

Attachments: Biogenic Carbon Letter 8-7-14.pdf

From: Dave Tenny dtenny@nafoalliance.org Sent: Thursday, August 7, 2014 1:23:28 PM

To: Goffman, Joseph **Subject:** Letter to Podesta

Hi, Joe – I know you are out of the office, but I wanted to make sure you saw the attached letter to John Podesta on the carbon accounting framework. 25x25 lead the letter, but our folks were zealous to sign on so, not surprisingly, you will see a lot of them among the signatories.

Let's plan to get together soon after you get back. Hopefully you are getting a well-earned rest.

Thanks, Joe.

Dave

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September 16, 2014

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Attn: Docket ID No. EPA-HQ-OAR-2013-0602

Re: Request for Notice of Data Availability and Extended Comment

Period

(Docket ID No. EPA-HQ-OAR-2013-0602)

Dear Administrator McCarthy:

On behalf of the forest products industry, we are writing to request that the United States Environmental Protection Agency (EPA) make available for public comment the revised *Accounting Framework for Biogenic CO₂ Emissions from Stationary Sources* (Accounting Framework) referred to in the proposed rule "Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units." 79 Fed. Reg. 34,830 (Jun. 18, 2014) (111(d) Proposed Rule). We appreciate that EPA extended the public comment period for the 111(d) Proposed Rule, but until the Accounting Framework is issued for public comment, we and other interested parties will not have an adequate opportunity to comment on the 111(d) Proposed Rule.

Three years ago, EPA committed to completing an Accounting Framework for biogenic CO₂ emissions by July 2014. While EPA proposed a draft Accounting Framework in September 2011, it has not yet issued a revised Framework for comment that accounts for the substantial and significant input of the public and the Science Advisory Board. The 111(d) Proposed Rule discusses the use of biomass energy as one option the states can use to mitigate greenhouse gas emissions. However, EPA has not disclosed how it intends to treat biogenic carbon emissions from affected entities and refers to the pending revised Accounting Framework. Interested parties who want to comment on biomass-related issues in the 111(d) Proposed Rule are deprived of their right to fair notice and an opportunity to comment so long as EPA fails to issue the revised Accounting Framework that will determine the central issue of biomass carbon neutrality.

The Honorable Gina McCarthy, Administrator United States Environmental Protection Agency September 16, 2014 Page 2

We request that the EPA immediately issue a Notice of Data Availability (NODA) that contains the Accounting Framework and provide a reasonable comment period to analyze it and develop comments on both the Framework and its effect on the 111(d) Proposed Rule.

EPA's recent actions support our request. On February 25, 2014, EPA issued a NODA in support of its proposed rule "Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources: Electric Utility Generating Units." 79 Fed. Reg. 10,750 (Feb. 26, 2014) (111(b) Proposed Rule). The 111(b) Proposed Rule NODA produced technical support documentation, which had not been produced to the docket at the time of proposal on January 8, 2014. In addition to rectifying its error via the NODA, EPA announced a 60-day extension of the public comment deadline for the 111(b) Proposed Rule. Thus, EPA has ample precedent to take the requested action under these circumstances.

In light of the concerns expressed by potentially affected entities, we strongly urge EPA to take immediate action to rectify this matter and release the Accounting Framework critical to meaningful public comment on biomass-related issues.

Sincerely,

Donna Harman President & CEO

American Forest & Paper Association

Robert Glowinksi President & CEO

American Wood Council

David P. Tenny President & CEO

National Alliance of Forest Owners

From: Goffman, Joseph

Sent: Wednesday, February 12, 2014 10:52 AM

To: Noe, Paul

Cc: Missimer, Katie;McCabe, Janet;Atkinson, Emily;Browne, Cynthia

Subject: Re: Catch up

Got it. Thanks.

From: Noe, Paul <Paul_Noe@afandpa.org>

Sent: Wednesday, February 12, 2014 10:44:34 AM

To: Goffman, Joseph Cc: Missimer, Katie Subject: Re: Catch up

Joe: I assume we made clear that AF&PA has moved to your neighborhood, so we now are at 1101 K Street, NW. Suite

700. Entrance is 12th & K, NW

Paul

On Feb 11, 2014, at 6:32 PM, "Goffman, Joseph" <Goffman.Joseph@epa.gov> wrote:

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> Very helpful. Thanks.
> From: Noe, Paul < Paul Noe@afandpa.org>
> Sent: Tuesday, February 11, 2014 4:05:45 PM
> To: Goffman, Joseph
> Subject: RE: Catch up
> Joe: Would it be helpful if I sent you slides on the issues we want to cover when we see you?
>
> Paul
> -----Original Message-----
> From: Goffman, Joseph [mailto:Goffman.Joseph@epa.gov]
> Sent: Tuesday, February 11, 2014 12:57 PM
> To: Noe, Paul
> Subject: Re: Catch up
> Sure. I have a long day scheduled. Would 7 or 8 be too late?
> From: Noe, Paul < Paul_Noe@afandpa.org>
> Sent: Tuesday, February 11, 2014 12:48:39 PM
> To: Goffman, Joseph
> Subject: Catch up
> Joe: can I catch you by phone briefly at end of the day -- after 5pm?
> Paul Noe
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From:

Goffman, Joseph

Sent: To: Tuesday, February 11, 2014 6:56 PM

Subject:

McCabe, Janet Fw: Catch up

Attachments:

Air Issues AF&PA slides v1 2-12-14.pptx

From: Noe, Paul <Paul_Noe@afandpa.org> Sent: Tuesday, February 11, 2014 6:55:02 PM

To: Goffman, Joseph Subject: RE: Catch up

Joe: Please see attached.

Best regards

Paul

Paul Noe
Vice President for Public Policy
Paul_Noe@afandpa.org
(202) 463-2777
AMERICAN FOREST & PAPER ASSOCIATION
1101 K Street, N.W., Suite 700
Washington, D.C. 20005

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